

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
THOMAS E. DAUBERT, JR.	:	
TRACY L. DAUBERT	:	
Debtors,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:16-bk-00946-HWV
MIDFIRST BANK,	:	
Movant,	:	
	:	
THOMAS E. DAUBERT, JR. and	:	
TRACY L. DAUBERT,	:	
Debtors	:	
	:	
And CHARLES J. DeHART III,	:	
Chapter 13 Trustee	:	
Respondents.	:	

**DEBTOR'S ANSWER TO MOVANT'S MOTION**  
**FOR RELIEF FROM THE AUTOMATIC STAY AND REQUEST FOR SPECIAL RELIEF**

AND NOW COMES, Debtors, Thomas E. Daubert, Jr. and Tracy L. Daubert, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. It is admitted the Debtor is behind on payments to Movant.
7. Admitted. Debtors are willing to get current with Movant via a plan amendment or via stipulation to cure the arrears within a period of time.

8. Paragraph 8 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

9. Paragraph 9 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay, Order Movant to re-record the deed back in the name of the Debtors, and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS, & HARSHBERGER

Dated: March 10, 2020

s/Chad J. Julius

ID# 209496

8150 Derry Street

Harrisburg, PA 17111.5260

717.909.5858

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	:	
And CHARLES J. DeHART III,	:	
Chapter 13 Trustee	:	
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**CERTIFICATE OF SERVICE**

I, Colleen Reed, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within **Respondent's Answer to Movant's Motion For Relief From The Automatic Stay** upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	James C. Warmbrodt, Esquire BNY Mellon Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

s/ Colleen Reed  
\_\_\_\_\_  
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Email: creed@ljacobsonlaw.com

Dated: March 10, 2020